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MINERALS PROGRAM
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Gene M. Stevenson
P.O. Box 317
Bluff, Utah 84512

*copy to
Holland Shepherd*

February 21, 1994

Mr. Scott Hirschi, Division Director
Department of Natural Resources
Division of State Lands and Forestry
3 Triad Center, Suite 400
355 West North Temple
Salt Lake City, Utah 84180-1204

FEB 24 1994

DIV. OF OIL, GAS & MINERALS

RE: Protest strip mine operation on State of Utah trust lands,
Sec. 16-T41S-R20E (LIME RIDGE), San Juan County, Utah.

Dear Mr. Hirschi;

My protest is not directed so much at the contractor doing the work (Jerry Holliday Construction), as it is to the State of Utah for allowing work to commence first without a proper lease, and later for the work to proceed without even filing plans of operation or surface rehabilitation as required by Article XVI of his lease.

If it is the State's policy to let this type of work proceed on State lands, without so much as a hand-slap, then the message has been well received by any future company or individual that follows suit (i.e. start the work, then do the paper work). In this particular case, the State has chosen "to look the other way" while "arrangements" have been made between Holliday, the County, and the highway department.

Until now, this area, Lime Ridge, had only been stripped to hard rock by the incessant overgrazing of cattle that has denuded the landscape. Now the final insult, a quarry, in a highly visible area bordering the San Juan River, overlooking and adjacent to innumerable archaeological and historical sites. And the quarry could have been dug into the same limestone strata, only a mile or so farther west where the operation would not be visible, either from the highway or the river corridor.

One of the most popular and informative hikes on Comb Ridge is to retrace the Mormon pioneer's trail up "San Juan Hill" and to gaze at the incredible landscape that falls below the observer in all directions; the impenetrable sandstone escarpment of Comb Ridge and the distant Abajo Mountains to the north, the San Juan river valley and the distant Sleeping Ute and La Plata Mountains to the east and south, the "Mule's Ear" and Chinle Wash to the

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southwest, and Lime Ridge looming nearly a thousand feet in elevation immediately across the wash, a zigzag array of gray limestone and red siltstones draped across the back of the Monument upwarp. It's an awe-inspiring sight, so much so that the Mormon pioneers inscribed "we thank thee, o'God" near the crest of the ridge over 100 years ago. Ancient Native Americans built kivas on both sides of the river and lived in the valley for centuries, reverent to this special place. It was a cross-roads, a juncture, and a spiritually holy place recognized as such by over 10,000 years of inhabitants and passersby-- until now.

Thanks to the State of Utah's lame land use policy, all visitors to this spectacular site will now be able to watch a limestone quarry operation, complete with rock crushers, bulldozers, trucks, dust, and noise. All will be able to bear witness to yet another travesty- the grinding up of another landmark of pristine beauty. The crushed rock will be used to cover uranium tailings near Mexican Hat; creating a new scar, only to cover an older one.

If there was something particularly special, or unique, about this outcropping of limestone I might have a different viewpoint, but it is not just exposed here, in section 16, and nowhere else. As a geologist who has worked in this area for over 20 years now, I can say, unequivocally, that there is absolutely NOTHING about this particular outcropping of limestone that makes it special, other than the fact that it is on State Land.

As throughout much of the State of Utah, where federally controlled lands dominate, sections 16 and 32 in each township are commonly set aside as State lands. Problems have cropped up across the state due to this rather arcane and rigid grid system that was placed on these lands when surveyed long ago. State lands within National Park boundaries have been\ are being challenged by equally bone-headed maneuvers, but are in highly visible areas (Arches NP, Canyonlands NP, etc.) and receive lots of public attention. However, this part of Utah is still along a road less traveled, and simply doesn't receive enough attention to cause any drastic change in policy. It's just another little chunk of solitude and wilderness that will be permanently scarred by the bulldozer.

What makes this area unique for limestone quarrying, then, is that it just happens to be on State land, where little or no environmental regulations will "slow down the job"?? Is this the message the Department of Natural Resources is sending forth?

And it is here, at the State level, that land "management" and "planning" and "environmental" concerns has given way to Utah good ole boy politics. Let's examine the facts; Holliday starts mining in trespass in July, 1993 and the Division of State Lands

lets him get away with it. Then Holliday gets his lease in order. Next, Holliday starts strip mining without filing either a plan of operation or a reclamation plan, as stipulated in Article XVI of his lease, and again, the Division of State Lands lets him get away with it. So, the strip mining is underway; who cares if rules and regulations have been circumvented? Afterall, some temporary jobs will be provided for a while, but once more, at what cost?

Of course, the really sad part of this tragedy is that less than two miles to the west, in section 18 (Federal BLM lands currently leased by Holliday) the very same limestone beds outcrop in a secluded area, not visible from the river or the highway.

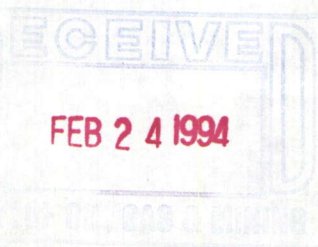
It's obvious that State owned lands are vulnerable to exploitation, strip mining in this case, which makes me really suspicious of just what's in store for those of us who live in Bluff, a small town flanked to the north and east by State lands. The State has already demonstrated it's ignorance regarding the community's water supply with similar actions (or inactions) taken over the past number of years. Somewhere along the line, the leaders in this state have forgotten to MANAGE its' natural resources, not MINE every resource as if there was no tomorrow-there might not be!

Sincerely,



Gene M. Stevenson
Professional Geologist #6232

cc: Ted Stewart, Executive Director
Jerry Mansfield, DSLF Mineral Resource Specialist
Jim Carter, Division Director DOGM
✓ Holland Shepherd, DOGM Sr. Reclamation Specialist
Wayne Hedberg, DOGM
Bob Turri, BLM, San Juan Resouce Area
San Juan Co. Commission



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